

EXHIBIT B

Star, Gregory J.

From: Wes Lambert <wlambert@koehlerneal.com>
Sent: Wednesday, July 11, 2012 3:45 PM
To: Star, Gregory J.
Cc: Roy A. Hulme; Baird, Macavan A.; James Koehler; rmclaughlin@reminger.com; Laura Myers; Kelleher, Joseph M.
Subject: RE: SAP/Hodell

I understand, but do not necessarily agree with, your position regarding the late notice. If he is not fully capable of answering such questions on behalf of SAP that will be fine, and I will limit the questions on what he can reasonably answer. If you wish to instruct him not to answer to such topics in their entirety, we can take that up with the Court at a later time.

P. Wesley Lambert, Esq.

Koehler
Neal

3330 Erieview Tower
1301 East Ninth Street
Cleveland, Ohio 44114
Office: 216.539.9370
Direct: 216.539.9375
Fax: 216.916.4369
wlambert@koehlerneal.com
www.KoehlerNeal.com

Koehler
Neal

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From: Star, Gregory J. [mailto:Gregory.Star@dbr.com]
Sent: Wednesday, July 11, 2012 3:23 PM
To: Wes Lambert
Cc: Roy A. Hulme; Baird, Macavan A.; James Koehler; rmclaughlin@reminger.com; Laura Myers; Kelleher, Joseph M.
Subject: RE: SAP/Hodell

Wes:

This is patently improper under Rule 30(b)(1), which requires "reasonable notice" of the taking of a deposition. It is clearly *not* reasonable to serve a new 30(b)(6) notice with new topics of inquiry less than two days before a 30(b)(6) deposition which has been scheduled for weeks under a prior notice. SAP treats the last notice as the operative one, and this new notice is, in our view, a nullity.

-Greg

From: Wes Lambert [<mailto:wlambert@koehlerneal.com>]
Sent: Wednesday, July 11, 2012 3:02 PM
To: Star, Gregory J.
Cc: Roy A. Hulme; Baird, Macavan A.; James Koehler; rmclaughlin@reminger.com; Laura Myers
Subject: RE: SAP/Hodell

Please see the attached Third Revised Notice of Deposition for SAP America, Inc. and SAP AG.

P. Wesley Lambert, Esq.

**Koehler
Neal**

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From: Star, Gregory J. [<mailto:Gregory.Star@dbb.com>]
Sent: Wednesday, July 11, 2012 2:03 PM
To: Wes Lambert
Cc: Roy A. Hulme; Baird, Macavan A.; James Koehler; rmclaughlin@reminger.com; Laura Myers
Subject: RE: SAP/Hodell

Wes:

Unless you are planning to ask a host of irrelevant questions and/or show this witness hundreds of exhibits, then I think you should be able to complete the deposition in the normal 7 hours, or very close to that. As I stated, let's see what happens on Friday and then deal with this if there is even an issue. I am not going to commit to an extra day in advance, and am not authorized to do that anyway.

-Greg

From: Wes Lambert [<mailto:wlambert@koehlerneal.com>]
Sent: Wednesday, July 11, 2012 1:55 PM
To: Star, Gregory J.

Cc: Roy A. Hulme; Baird, Macavan A.; James Koehler; rmclaughlin@reminger.com; Laura Myers
Subject: RE: SAP/Hodell

I am confused. Under what circumstances "may" it be a possibility? I don't want to start at 7:00 am again and go until 10:00 at night – its not productive for me or the witness. I have been extremely accommodating with Hodell's management, as has Roy been with Mr. Lowery. Are you telling me SAP will not provide the same accommodations?

P. Wesley Lambert, Esq.

**Koehler
Neal**

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**Koehler
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From: Star, Gregory J. [<mailto:Gregory.Star@dbr.com>]
Sent: Wednesday, July 11, 2012 1:50 PM
To: Wes Lambert
Cc: Roy A. Hulme; Baird, Macavan A.; James Koehler; rmclaughlin@reminger.com; Laura Myers
Subject: RE: SAP/Hodell

Wes:

Let's see how things go on Friday. I am sure we can start earlier and get more time in if needed on Friday. I am not now going to agree to more time, nor to doing a further session by video, although both *may* be a possibility.

-Greg

From: Wes Lambert [<mailto:wlambert@koehlerneal.com>]
Sent: Wednesday, July 11, 2012 9:53 AM
To: Star, Gregory J.
Cc: Roy A. Hulme; Baird, Macavan A.; James Koehler; rmclaughlin@reminger.com; Laura Myers
Subject: RE: SAP/Hodell

Greg - I have not received an answer to my email below. Hodell has been very generous with the time allotted SAP to question its CEO over the course of 2 days in February, and has allotted 2 days for you to question Kevin Reidl

individually and as the 30(b)(6) representative for Hodell. I will expect that the same courtesy will be extended with regard to Mr. Killingsworth. Thanks.

P. Wesley Lambert, Esq.

Koehler
Neal

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From: Wes Lambert

Sent: Monday, July 09, 2012 10:07 AM

To: 'Star, Gregory J.'

Cc: Roy A. Hulme; Baird, Macavan A.; Kelleher, Joseph M.

Subject: RE: SAP/Hodell

Greg – Looking through my outline for Paul Killingsworth, I think it is doubtful we will be able to get it done in one day. Since we are starting on a Friday, I think we should agree to conclude the deposition by videoconference the following week if additional time is necessary. Thanks.

Wes

P. Wesley Lambert, Esq.

Koehler
Neal

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From: Star, Gregory J. [<mailto:Gregory.Star@dbr.com>]
Sent: Monday, July 09, 2012 9:05 AM
To: Wes Lambert
Cc: Roy A. Hulme; Baird, Macavan A.; Kelleher, Joseph M.
Subject: SAP/Hodell

Wes:

Please confirm the deposition schedule for the week of July 30. I have down that we are conducting Kevin's deposition on July 30 and 31, and that we have Terry, Ellen, and Joe for August 1 and 2 (and 3 if needed).

-Greg

Gregory J. Star
Drinker Biddle & Reath LLP
One Logan Square, Ste. 2000
Philadelphia, PA 19103-6996
(215) 988-2734

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